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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PG&E CORPORATION, PACIFIC
GAS AND ELECTRIC COMPANY,

Reorganized Debtors,

- ☒ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**JOINDER OF THE CITY OF AUSTIN EMPLOYEES' RETIREMENT SYSTEM IN
LEAD PLAINTIFF PERA AND THE SECURITIES ACT PLAINTIFFS' RESPONSE
AND OPPOSITION TO THE REORGANIZED DEBTORS' THIRTY-THIRD
SECURITIES OMNIBUS CLAIMS OBJECTION**

1 The City of Austin Employees' Retirement System ("City of Austin") hereby submits this
2 joinder (the "Joinder") in Lead Plaintiff PERA and the Securities Act Plaintiffs' Response and
3 Opposition to the Reorganized Debtors' Thirty-Third Securities Omnibus Claims Objection (ECF
4 No. 14342) (the "Opposition"). In support hereof, City of Austin states as follows:

5 **BACKGROUND**

6 1. City of Austin is a Securities Claimant that timely filed a proof of claim against
7 PG&E Corporation ("PG&E") in accordance with the Extended Bar Date Order. Specifically, on
8 April 16, 2020, City of Austin filed Claim No. 101047 against PG&E. On October 13, 2023, City
9 of Austin filed an amendment to proof of claim No. 101047 adopting the allegations in the Third
10 Amended Consolidated Class Action Complaint for the Violation of the Federal Securities Laws
11 (ECF No. 121) filed in *In re PG&E Corp. Sec. Litig.*, No. 3:18-cv-03509 (N.D. Cal.) (the "PERA
12 Complaint"), except the PERA Complaint's allegations concerning the plaintiffs in that action.

13 2. On December 13, 2023, the Debtors filed the 33rd Omnibus Claim Objection (the
14 "Objection") [Dkt. No. 14200], which seeks dismissal of the claims filed by numerous Securities
15 Claimants including City of Austin.

16 3. The factual and legal elements of Securities Claimants' claims, such as the falsity
17 of Debtors' statements, the scienter of Debtors and their officers in making those statements,
18 whether Debtors' false statements caused the Securities Claimants' damages, and the amount of
19 damages per share of PG&E common stock, are common to all Securities Claimants.

20 **JOINDER**

21 4. For the foregoing reasons and the reasons set forth in the Opposition, City of
22 Austin hereby joins in all of the arguments contained in the Opposition in all respects, and adopts
23 and incorporates them herein by reference.

24 **CONCLUSION**

25 5. For the reasons set forth herein and in the Opposition, City of Austin joins in the
26 Opposition and asks that this Court enter an Order denying the Objection.
27
28

1 Dated: March 15, 2024

Respectfully submitted,

2 **BERNSTEIN LITOWITZ BERGER**
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